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Attorney for Plaintiff
SWAMI SHRADDHANANDA SARASWATI

** Defendants and their respective counsel listed after the caption.*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

SWAMI SHRADDHANANDA
SARASWATI, an individual,

Plaintiff,

v.

CITY OF BERKELEY, CITY OF
ALBANY, PACIFIC GAS & ELECTRIC
COMPANY, a California registered
domestic stock corporation, FRANK L.
YEE, MAY L. YEE, and DOES 1-100,
Inclusive,

CASE NO. 3:17-cv-04940-MMC
Civil Rights

**STIPULATION AND [PROPOSED] ORDER
TO CONTINUE GENERAL ORDER 56
DEADLINES**

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PACIFIC GAS AND ELECTRIC

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20 Attorneys for Defendants
FRANK L. YEE, MAY L. YEE

21 22 **STIPULATION**

23 Plaintiff SWAMI SHRADDHANANDA SARASWATI (“Plaintiff”) and Defendants
24 CITY OF BERKELEY, CITY OF ALBANY, PACIFIC GAS & ELECTRIC COMPANY, a
25 California registered domestic stock corporation, FRANK L. LEE, and MAY L. YEE
26 (“Defendants”) hereby jointly stipulate and request through their attorney of record that the
27 deadline to conduct a site inspection under General Order 56 be continued to December 15, 2017,
28 and the deadline to exchange initial disclosures under General Order 56 be continued to 7 days

after the date of the site inspection. This request for an extension of time is based on the following good cause:

1. Plaintiff filed this action on August 24, 2017. Dkt. No. 1.
2. The Court issued a scheduling Order with a deadline of December 7, 2017, to complete the joint site inspection of the subject premises. Dkt. No. 5.
3. The parties have been working cooperatively within the parameters of General order 56 to find a mutually agreeable date for the site inspection;
4. Due to the number of parties and the complexity of the issues involved, the parties have not yet agreed upon a date for the joint site inspection;
5. The parties have met and conferred and believe they will be able to hold the joint site inspection by December 15, 2017;
6. The parties also agree that it will be beneficial to continue the deadline to exchange initial disclosures until 7 days following the last date of the site inspection.

Therefore, IT IS HEREBY STIPULATED AND AGREED, by and between the parties hereto and their respective undersigned attorneys that the August 25, 2017, Scheduling Order (Dkt. No. 5) shall be vacated and the deadlines shall be reset as follows:

Last day for parties to hold Joint Site Inspection: December 15, 2017;

Last day to complete initial disclosures: December 22, 2017;

Last day for parties to meet and confer to discuss settlement: 28 days after Joint Site Inspection;

Last day for Plaintiffs to file a Notice of Need for Mediation: 42 days after Joint Site Inspection; and

Last day for Plaintiffs to file a Motion for Administrative Relief: 7 days after mediation.

IT IS SO STIPULATED.

Dated: December 6, 2017

DERBY, McGUINNESS & GOLDSMITH, LLP

/s/ Steven L. Derby
By: STEVEN L. DERBY, ESQ.
Attorneys for Plaintiff
SWAMI SHRADDHANANDA SARASWATI

1 Dated: December 5, 2017

BERKELEY CITY ATTORNEY'S OFFICE

2
3 /s/ Natalie Torres
4 By: NATALIE TORRES, ESQ.
Attorneys for Defendant
5 CITY OF BERKELEY

6 Dated: December 4, 2017

CLARK HILL LLP

7
8 /s/ Matthew T. Brand
9 By: MATTHEW T. BRAND, ESQ.
Attorneys for Defendants
10 CITY OF ALBANY

11 Dated: December 5, 2017

GOUGH & HANCOCK LLP

12
13 /s/ Sara Duncan
14 By: SARA DUNCAN, ESQ.
Attorneys for Defendants
15 PACIFIC GAS AND ELECTRIC COMPANY

16 Dated: December 8, 2017

HARTSUYKER, STRATMAN & WILLIAMS-
17 ABREGO

18 By: /s/ Nairi Paterson
19 NAIRI PATERSON, ESQ
Attorneys for Defendant
20 FRANK L. LEE and MAY L. LEE

[PROPOSED] ORDER

For GOOD CAUSE SHOWN and for the reasons set forth above, the General Order 56 deadlines set forth in the November 25, 2016, Scheduling Order shall be vacated and reset as follows:

Last day for parties to hold Joint Site Inspection: December 15, 2017;

Last day to complete initial disclosures: December 22, 2017;

Last day for parties to meet and confer to discuss settlement: 28 days after Joint Site Inspection;

Last day for Plaintiffs to file a Notice of Need for Mediation: 42 days after Joint Site Inspection; and

Last day for Plaintiffs to file a Motion for Administrative Relief: 7 days after mediation.

IT IS SO ORDERED.

Dated: _____, 2017

Honorable Maxine M. Chesney
Senior U.S. District Court Judge

FILER'S ATTESTATION

Pursuant to Civil Local Rule 5-1, I hereby attest I, Steven Derby, attorney with Derby, McGuinness & Goldsmith, LLP, received the concurrences of Natalie Torres, Matthew Brand, Sara Duncan and Nairi Paterson in the filing of this document.

/s/ Steven L. Derby
Steven L. Derby